

# SEALED

BY THE ORDER OF THE COURT

CLARE E. CONNORS #7936  
United States Attorney  
District of Hawaii

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII  
May 20, 2022  
Pam Hartman Beyer, Clerk of Court

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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, ) Mag. No. 22-872 WRP  
                                  )  
Plaintiff,                   ) CRIMINAL COMPLAINT;  
                                  ) AFFIDAVIT IN SUPPORT OF  
v.                            ) CRIMINAL COMPLAINT  
                                  )  
                                  )  
                                  )  
BRYAN MELVIN BRANDENBURG, )  
                                  )  
Defendant.                   )  
                                  )  
                                  )

### CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true  
and correct to the best of my knowledge and belief.

Count 1  
Transmitting Threats in Interstate Commerce  
(18 U.S.C. § 875(c))

On or about May 4, 2022, in the District of Hawaii, the defendant, BRYAN MELVIN BRANDENBURG, knowingly and willfully did transmit in interstate commerce from the State of Hawaii, to the State of Utah, a communication via electronic transmission to Victim 1, Victim 2, and other people, and the communication contained a threat to injure people, including Victim 1 and 2, who were within the Utah State Courts 3<sup>rd</sup> District Courthouse in Salt Lake City, that is to bomb Utah State Courts 3<sup>rd</sup> District Courthouse in Salt Lake City.

All in violation of Section 875(c) of Title 18 of the United States Code.

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Count 2

Threatening and Conveying False Information Concerning Use of an Explosive  
(18 U.S.C. § 844(e))

On or about May 6, 2022, in the District of Hawaii, the defendant, BRYAN MELVIN BRANDENBURG, through an instrument of interstate commerce, willfully made a threat, and maliciously conveyed false information knowing the same to be false concerning an attempt and an alleged attempt being made, to unlawfully threaten to kill, injure and intimidate any individual, and to unlawfully damage and destroy any building and other real property, by means of an explosive, that is to bomb Hall Labs and the University of Utah Center for Medical Innovation.

In violation of Title 18, United States Code, Section 844(e).

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this Complaint is based upon the facts set forth in the following affidavit, which is attached hereto and made part of this Complaint by reference.



Haider Alkhazaali  
Special Agent  
Federal Bureau of Investigation

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to FRCP 4(d) and 4.1(b)(2)(A) the 20<sup>th</sup> day of May, 2022.



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Wes Reber Porter  
United States Magistrate Judge

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## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Haider Alkhazaali, being duly sworn, depose and state the following;

1. I submit this affidavit in support of establishing probable cause that or about May 4, 2022 and May 6, 2022, within the District of Hawaii, BRYAN MELVIN BRANDENBURG (“BRANDENBURG”) violated 18 U.S.C. § 875 (c), which prohibits “transmit[ting] in interstate or foreign commerce any communication containing any threat to injure the person of another” and 18 U.S.C. § 844 (e), which prohibits “[t]hrough the use of ... [an] instrument of interstate ... willfully mak[ing] any threat ... to kill, injure, or intimidate any individual or unlawfully [ ] damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive.”

2. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since August 2021. During my training at the FBI Academy in Quantico, Virginia, I received instruction in a variety of investigative and legal matters, including the drafting of criminal complaint affidavits and requisite probable cause. Prior to joining the FBI, I was a Police Officer in the State of Pennsylvania. I am presently assigned to the Joint Terrorism Task Force – Pacific (“JTTF-P”), where I work a variety of criminal and national security matters including international and domestic terrorism. I have utilized court-authorized search warrants, conducted physical surveillance, and interviewed subjects and witnesses.

As a Federal Agent, I am authorized to investigate violations of the laws of the United States, and I am a law enforcement officer with the authority to execute search and arrest warrants under the authority of the United States. Due to my training and experience as an FBI Special Agent, I am familiar with the United States Criminal Code.

3. The information in this affidavit comes from my personal observations, my training and experience, and information obtained from other agents, law enforcement personnel, and witnesses. This affidavit is intended to show only that there is probable cause for the specified violations of federal law and does not set forth all of my knowledge about this matter.

#### **PROBABLE CAUSE**

4. On May 4, 2022, while in Hawaii, BRANDENBURG sent emails to people in Utah threatening to bomb the 3<sup>rd</sup> District Courthouse in Salt Lake City, the State Capitol, the Mayor's office, every Ivy League School, and the Federal Courthouse in San Diego.

5. On May 6, 2022, while in Hawaii, BRANDENBURG sent emails to people in Utah threatening to bomb Hall Labs and the University of Utah (hereinafter referred to as "U of U" as referenced in the email threat) Center for Medical Innovation.

6. BRANDENBURG corresponded via email with employees of the Utah State Courts – 3rd District – Salt Lake City (“COURT”), among other people, Victim 1 and 2, regarding his divorce. Victim 1 is an employee and Judicial Case Manager with the Utah State Courts - 3rd District Court - Utah Salt Lake City. Victim 2 is an employee and Judicial Assistant with the Utah State Courts - 3rd District Court - Utah Salt Lake City. In the email correspondence to the COURT, BRANDENBURG stated that his mailing address was on Kupuna Loop, Waipahu, HI 96797 and gave his phone number as (808) 452-XXXX. Specifically on the morning of May 4, 2022, BRANDENBURG stated that he could be reached at his Kupuna Loop address or at (808) 452-XXXX.

7. On March 8, 2022, BRANDENBURG emailed Victim 1 asking when he would get a ruling on his divorce. That same day, Victim 1 informed BRANDENBURG that the judge had 60 days to make a ruling.

8. On April 29, 2022, BRANDENBURG emailed the COURT: “60 days is today. I look forward to ending this nightmare. Thank you.” AGENT’S NOTE: 60 days from February 28, 2022, is April 29, 2022.

9. On May 2, 2022, the following email communications took place:

- a. BRANDENBURG: “I want a fucking divorce in Utah.”
- b. Victim 2: “Sir, your language will not be tolerated.”

10. On May 3, 2022, BRANDENBURG wrote to the COURT:

- a. "Your broken promise of a ruling in 60 days will not be tolerated children."
- b. "So go fuck yourself. All of you"
- c. "I guess I'll just have to bomb the city 😞"

11. On May 4, 2022, Victim 1 and Victim 2, while in Utah, received emails from bryangbrandenburg@gmail.com at their Utah court email addresses.

In separate emails BRANDENBURG wrote among other things:

- a. 6:59 AM = "Thanks for finally sending my Divorce decision. You can still fuck the fuck off."
- b. 7:08 AM = "We're still going to bomb the 3rd District Courthouse. Hae a nice day."
- c. 7:26 AM = "Now we're going to bomb the State Capital...."
- d. 7:28 AM "And then.... We'll bomb the mayor's office..."
- e. 7:34 AM = "And then, we're going to level the sacred temple..."
- f. 7:37 AM = "And then.... We'll level the Rockefeller Center in NYC..."
- g. 8:00 AM = "And NOW... WE'RE BOMBING EVERY IVY LEAGUE SCHOOL, STARTING WITH MIT, YALE, AND HAAARRVVVVARDDDD..."
- h. 8:38 AM = "We're bombing the Federal Couthouse in San Diego to teach them a lesson..."

12. On May 4, 2022, after Victim 2 received the email that threatened to bomb the courthouse where he/she was at work at that time, he/she notified the Head of Security for the Utah courthouse, as well as the Salt Lake City Police Department about the threat. In the email that threatened to bomb the Federal Courthouse in San Diego, a screen shot picture of the Federal Courthouse in San Diego and its address were included. On May 4, 2022, Victim 1 after receiving the email that threatened to bomb the courthouse where he/she was at work at that time, he/she notified the Head of Security for the Utah courthouse.

13. On May 6, 2022, Media Person 1, Media Person 2, Media Person 3, and Media Person 4, all in Utah, received emails from [bryangbrandenburg@gmail.com](mailto:bryangbrandenburg@gmail.com) at their email addresses. At 8:39 AM, BRANDENBURG wrote:

“Hall Labs is Frankenstein Inc. They put illegal medical devices in me without my knowledge or permission with U of U Center for Medical Innovation.  
We're bombing both campuses today for crimes against humanity.  
Bryan Brandenburg”.

14. Media Person 1 is an employee of the Salt Lake City Weekly in Salt Lake City, Utah. Media Person 2 is a co-host of a Salt Lake City, Utah morning show. Media Person 3 is a reporter and editor at the Salt Lake Tribune in Salt

Lake City, Utah. Media Person 4 is an editor of the Utah InDepth Team in Salt Lake City, Utah.

15. According to the four media people, they knew BRANDENBURG from conducting interviews with him in the past.

16. Media Person 2 informed the FBI that on May 6, 2022, he/she received an email from BRANDENBURG relative to “Hall Labs” and the “U of U Center for Medical Innovation.” He/she was on the air at the time the email was received but he/she believed he/she read it within approximately 15 minutes of its receipt. After reading the bomb threat, he/she also noticed the other email recipients. He/she subsequently contacted one of the recipients, Media Person 3, as he/she had just left the radio studio after finishing his/her movie reviews earlier that morning. Media Person 3 and Media Person 2 decided that Media Person 3 should contact the police as Media Person 2 was still broadcasting on air.

17. Media Person 3 informed the FBI that on May 4, 2022, he/she received emails from BRANDENBURG about blowing up the courthouse in Salt Lake City and on May 6, 2022, he/she received another email from BRANDENBURG threatening to bomb Hall Laboratories and the U of U. He/she noticed Media Person 2 also received the email. The two communicated about the email and notified law enforcement.

18. After being notified by Media Person 3, University of Utah police department was dispatched and evacuated the U of U Center for Medical Innovation which is in the basement level of the Health Sciences Library. Furthermore, the police department conducted a bomb sweep of the buildings using Explosive Ordnance Device (EOD)/K9 Dogs. After an extensive search of the area, the police were able to declare the scene safe as no explosive devices were uncovered and allowed the evacuees back into the buildings.

19. Media Person 4 informed the FBI that on May 6, 2022, he/she received an email from BRANDENBURG, where he communicated he would bomb the U of U. By the time Media Person 4 opened the email, he/she had seen news indicating the bomb threat at the U of U was deemed not credible. After he/she read the email, he/she reached out to his/her boss and legal counsel.

20. On May 6, 2022, in Hawaii, FBI special agents, interviewed BRANDENBURG. BRANDENBURG, among other things, confirmed he used the email address bryangbrandenburg@gmail.com on May 4 and 6, 2022 to send the emails containing bomb threats to Victim 1, Victim 2, Media Person 1, Media Person 2, Media Person 3, and Media Person 4. Furthermore, BRANDENBURG read the emails out loud and acknowledged sending the emails by initial hard copies of the emails except the threat to the Federal Court in San Diego (this email

threat was brought to the FBI's attention after the interview was conducted).

BRANDENBURG explained he sent the emails to get their attention and to pressure the "court" and "family" so he can get his money back that they stole from him. BRANDENBURG stated he was unhappy with how long it took the judge to rule on his divorce case and believed the court and his family worked together to take his money.

21. Based on my training and experience, and my investigation into this matter, I know the emails sent by BRANDENBURG while he was in Hawaii traveled through computer servers outside the State of Hawaii used by Gmail (a free web-based email service provided by Google) prior to being viewed by Victim 1, Victim 2, Media Person 2, Media Person 3, and Media Person 4 who received them in Utah.

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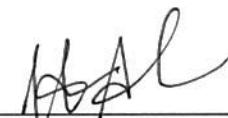
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22. Based on the facts described above, and on my training and experience, I submit that there is probable cause to believe that BRYAN MELVIN BRANDENBURG, within the District of Hawaii, violated 18 U.S.C. § 875(c) and 18 U.S.C. § 844(e) on May 4, 2022 and 18 U.S.C. § 844(e) on May 6, 2022, by threatening to bomb the 3<sup>rd</sup> District Courthouse in Salt Lake City, Utah State's Capitol, Mayor's office, every Ivy League School, the Federal Courthouse in San Diego, and Hall Labs and the U of U Center for Medical Innovation.

FURTHER AFFIANT SAYETH NAUGHT.



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Haider Alkhazaali  
Special Agent  
Federal Bureau of Investigation

This Criminal Complaint and Agent's Affidavit in support thereof were presented to, approved by, and probable cause to believe that the defendant above-named committed the charged crime found to exist by the undersigned Judicial Officer at 4:45 p.m. on May 20, 2022.

Sworn to under oath before me electronically, and attestation acknowledged pursuant to FRCP 4(d) and 4.1(b)(2)(A) this 20<sup>th</sup> day of May, 2022.



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Wes Reber Porter  
United States Magistrate Judge